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Attorneys for Mark Dannels, Pat Downing, Kris Karcher, Shelly McInnes, Raymond McNeely, Kip Oswald, Michael Reeves, Sean Sanborn, Eric Schwenninger, Chris Webley, Anthony Wetmore, Craig Zanni, David Zavala, City of Coquille, City of Coos Bay, Coos County, Oregon, and the Estate of David E. Hall

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

Nicholas James McGuffin,  
as an individual and as guardian  
*ad litem*, on behalf of S.M., a minor,

Plaintiffs,  
v.

Mark Dannels, Pat Downing, Susan  
Hormann, Mary Krings, Kris Karcher,  
Shelly McInnes, Raymond McNeely,  
Kip Oswald, Michael Reaves, John  
Riddle, Sean Sanborn, Eric Schwenninger,  
Richard Walter, Chris Webley, Anthony  
Wetmore, Kathy Wilcox, Craig Zanni,  
David Zavala, Joel D. Shapiro as Administrator  
of the Estate of David E. Hall, Vidocq Society,  
City of Coquille, City of Coos Bay, and Coos County,

Case No. 6:20-cv-01163-MK

**Response to Plaintiffs' First  
Set of Requests for Admissions  
and Interrogatories  
to Defendant Chris Webley**

Defendants.

Page 1 of 4 – Response to Plaintiffs' First Set of Requests for Admission and Interrogatories  
to Defendant Chris Webley

Nicholas James McGuffin, as an Individual and as guardian ad litem, on behalf of S.M., a minor,

Case No. 3:21-cv-01719-MK  
(Trailing Case)

Plaintiffs,

v.

Oregon State Police,

Defendant.

Defendant Chris Webley hereby submits his response to Plaintiffs' First Set of Requests for Admission and Interrogatories as follows:

**REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Admit that your handwriting appears on the document attached as Attachment 1.

**ANSWER:** Admit.

**REQUEST FOR ADMISSION NO. 2:** Admit that you created the handwritten notes and colored highlighting on the document attached as Attachment 2.

**ANSWER:** Deny.

**REQUEST FOR ADMISSION NO. 3:** Admit that your handwriting appears on the document attached as Attachment 3.

**ANSWER:** Deny.

**REQUEST FOR ADMISSION NO. 4:** Admit that your handwriting appears on the document attached as Attachment 4.

**ANSWER:** Deny.

**REQUEST FOR ADMISSION NO. 5:** Admit that your handwriting appears on the document attached as Attachment 5.

**ANSWER:** Deny.

**INTERROGATORIES**

**INTERROGATORY NO. 1:** Is it your position that there was probable cause to arrest and charge Nicholas McGuffin with the murder of Leah Freeman? If so, state the factual basis for your position.

**ANSWER:** Yes; this position is based upon the fact that a Grand Jury for Coos County returned a true bill on charges involving the death of Leah Freeman, which was the basis of the indictment and arrest of Nicholas McGuffin.

Dated: September 6, 2024.

Respectfully submitted,

By: /s/ Sarah R. Henderson  
FRANZ & HENDERSON  
**Sarah R. Henderson**  
OSB #153474  
(541) 741-8220  
**Of Attorneys for Defendants Mark Dannels,  
Pat Downing, Kris Karcher, Shelly McInnes,  
Raymond McNeely, Kip Oswald, Michael  
Reeves, Sean Sanborn, Eric Schwenninger,  
Chris Webley, Anthony Wetmore, Craig Zanni,  
David Zavala, and City of Coquille, City of  
Coos Bay, Coos County, Oregon, and the  
Estate of David E. Hall**

**VERIFICATION**

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief.

DATED this 6<sup>th</sup> day of September 2024.

/s/ Chris Webley  
Chris Webley

## ATTACHMENT 1

Hjordis <sup>A-</sup> Lindgren 5-19-10 e library

7-8-58 541-396-2258

290-6216

SSI w. 4<sup>th</sup> fl. 22 yrs.

1300 - Avio survivor fan.

- Watching survivor on TV. - Brother over w/ dog.

~~- Night Rudy got voted off. Upset - wrong people~~

- Watched till end of show. Brother got up - took dog for walk. Got back.

- Returned 1/2 hr. later.

- Left around 2100 - returned app. 2130.

- May have left a few minutes before end but after Rudy was off.

- Recall John commanding about "uncontrollable juveniles" after coming back. Leah yelling at somebody.

- Neighbor, Dez, told Hjordis Leah in fight w/ people in back.

\* Neighbor

- Dez ( couch ) wife Barbara - daughter lives elsewhere now

- daughter:

- Elm/ w. 4<sup>th</sup> fl. facing Elm. 446 N. Elm.

~~910-63~~ 91063 N. Bank - Crockett

- John stopped/talked w/ Dez for while. Continue walk & passed people in front of house (Leah/Nick).